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October 30, 2014

Via ECF

Honorable Denise L. Cote
United States District Court for the
Southern District of New York United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *In re Application of The Coalition To Protect Clifton Bay and Louis Bacon for an Order Pursuant to 28 U.S. C. § 1782 to Conduct Discovery for Use in Foreign Proceedings, 14 Misc. 258 (DLC)*

Dear Judge Cote:

We are the attorneys for Respondent Stephen J. Feralio. Pursuant to the Court's direction at the September 11, 2014 court conference, we write to update the Court regarding our efforts to review and produce materials to Nygard International Partnership and Nygard Inc. responsive to the subpoena issued by Petitioners, The Coalition To Protect Clifton Bay and Louis Bacon.

For the period October 23, 2014 - October 29, 2014, Mr. Feralio devoted approximately 72 hours to reviewing and cataloguing responsive materials.

At the beginning of this week, we added five attorneys to review team. Today, we are adding five more reviewers to the team, for a total of ten additional reviewers. Over the course of the week, Mr. Feralio and the new reviewers (who only worked a partial week) reviewed approximately 6,446 video and other electronic files and designated approximately 358 files as responsive.

Today, we will be sending to counsel for Nygard International Partnership and Nygard Inc. a hard drive containing approximately 23 GB of responsive materials in 358 separate files, Bates stamped SF00005078-SF00005448. With the addition of ten reviewers, we are making significant efforts to complete the review by the Court's deadline of November 14, 2014.

We are available to answer any questions the Court may have regarding our efforts. Per

H E R R I C K

October 30, 2014

Page 2

the Court's instructions, we will further update the Court next week on our progress.

Respectfully submitted,

s/ Steven D. Feldman

Steven D. Feldman

cc: Counsel for Petitioners (by ECF)
Counsel for Nygard International Partnership and Nygard Inc. (by ECF)